

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: : BANKRUPTCY NO. 14-10390TPA  
DONALD EUGENE MOYER, JR. AND : THE HON. THOMAS P. AGRESTI  
TONYA HELENE MOYER, his wife, : CHAPTER 13  
Debtors :  
DONALD EUGENE MOYER, JR. AND : RELATED TO DOCUMENT NO. 45  
TONYA HELENE MOYER, his wife, :  
Movants : DATE & TIME OF HEARING:  
v. : Wednesday, August 16, 2017 at 9:30 a.m.  
NO RESPONDENT :  
: RESPONSES DUE:  
: July 31, 2017

**CERTIFICATION OF NO OBJECTION REGARDING**  
**APPLICATION TO EMPLOY SPECIAL COUNSEL (Document No. 45)**

The undersigned hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading to the Application to Employ Special Counsel filed July 14, 2017 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection, or other responsive pleading to the Application appears thereon. Pursuant to the Notice of Hearing with Response Deadline, objections to the Application were to be filed and served no later than July 31, 2017.

It is hereby respectfully requested that the Order attached to the Application be entered by the Court.

Dated: August 1, 2017

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY &  
KROTO, INC.

BY: /s/Michael S. JanJanin  
Michael S. JanJanin, Esquire  
PA Id. No. 38880  
The Quinn Law Firm  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Telephone: 814-833-2222  
Facsimile: 814-833-6753  
E-Mail: mjanjanin@quinnfirm.com  
Counsel for Debtors

#1065869